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PCRM PHYSICIANS
COMMITTEE
FOR
RESPONSIBLE
MEDICINE 5100 WISCONSIN AVENUE, N.W., SUITE 400
WASHINGTON, DC 20016
T: (202) 686-2210 F: (202) 686-2216
PCRM@PCRM.ORG WWW.PCRM.ORG

January 28, 2004

Michael O. Leavitt, Administrator
US Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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Subject: Comments on the HPV test plan for 4-(1-methyl-1-phenylethyl)-N-[4-(1-methyl-1-phenylethyl)phenyl]aniline

Dear Administrator Leavitt:

The following are comments on the test plan for 4-(1-methyl-1-phenylethyl)-N-[4-(1-methyl-1-phenylethyl)phenyl]aniline (4,4'-Bis(alpha, alpha-dimethylbenzyl)diphenylamine) (CAS # 10081-67-1) for the HPV program, submitted by Crompton Corporation (Crompton). These comments are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These animal, health and environmental protection organizations have a combined membership of more than ten million Americans.

We are quite surprised to see this chemical sponsored by the Crompton Corporation with a proposal for additional testing since 4,4'-Bis(alpha, alpha-dimethylbenzyl)diphenylamine has already been addressed as part of a category of substituted diphenylamines, in a test plan by the Rubber and Plastic Additives (RAPA) Panel of the American Chemistry Council (ACC). That plan was submitted on December 18, 2001 and a revised plan was submitted on August 25, 2003. Therefore, it is clearly not necessary for Crompton to even submit a test plan, much less carry out tests that will kill over 675 animals, because the chemical is already adequately addressed. We ask that EPA call to Crompton's attention this duplication for 4,4'-Bis(alpha, alpha-dimethylbenzyl)diphenylamine and stress that no testing is warranted for this chemical alone and separate from the aforementioned category. We further ask that the EPA inform us of what steps it intends to take to ensure that such duplicative testing is avoided in the HPV program.

Thank you for your attention to this issue. I look forward to a prompt and favorable response to our concerns. I can be reached at 202-686-2210 ext. 335 or via email at kstoick@pcrm.org.

Sincerely,

Kristie Stoick, MPH
Research Analyst

Chad B. Sandusky, PhD
Director of Research